UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	**MDL No. 2875**
THIS DOCUMENT RELATES TO ALL CASES	**HON. ROBERT B. KUGLER**

NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION

TO: **Seth A. Goldberg, Esq,**
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103
Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc., Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Minli Zhang, Director of Finished Dose Formulation Quality at Zhejiang Huahai Pharmaceutical Co., Ltd, on March 22 through March 26, at 7:00 a.m. Hong Kong time, and continuing until completion, at Duane Morris LLP, 30 South 17th St, Philadelphia, Pennsylvania 19103, via Zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in her individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will be provided.

TAKING ATTORNEY FOR PLAINTIFFS:

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

March 8, 2021

PLAINTIFFS' CO-LEAD COUNSEL

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EXHIBIT A

30(B)(6) TOPICS

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

4. The testing performed by ZHP or its agents, to evaluate the purity and contents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

6. The testing performed by any entity or person other than ZHP or its agents but known to ZHP, to evaluate the purity and contents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

8. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

10. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

13. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the solvents utilized in the manufacture of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

15. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the solvents utilized in the manufacture of

ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

17. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the production equipment utilized in the manufacture of ZHP's valsartan finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

19. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the production equipment utilized in the manufacture of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States..

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

Quality Assurance and Quality Control Activities

22. ZHP's Standard Operating Procedures ("SOPs"), policies or procedures intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of ZHP's valsartan finished dose (regardless of intended sale location) in any facility that manufactured ZHP's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures.)

24. ZHP's application of cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic

impurities) such as nitrosamines, and residual solvents, in connection with the manufacture of ZHP's finished dose (regardless of intended sale location) in any facility that manufactured ZHP's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant cGMP's.)

26. The distinction between technical inquiries and deviation reports, as those terms are defined in ZHP's documents and in the ordinary course of business.

27. The processes and procedures for handling technical inquiries.

28. The processes and procedures for handling deviation reports.

30. The technical inquiries received by ZHP relating to ZHP's valsartan Finished Dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

32. The deviation reports drafted by or received by ZHP relating to ZHP's valsartan Finished Dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

ZHP's Communications with API and Finished Dose Customers and Downstream Customers

44. ZHP's oral and written communications with ZHP's valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose.

45. ZHP's oral and written statements (defined to include representations and warranties) to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of ZHP's valsartan API or ZHP's valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

Compliance with cGMPs

48. ZHP's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of ZHP's API and ZHP's valsartan finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API and ZHP's valsartan finished dose for sale in the United States.

EXHIBIT B

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Minli Zhang.

2. The complete production of Minli Zhang's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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CERTIFICATE OF SERVICE

I hereby certify that on March 8, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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